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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

AMERICAN CIVIL LIBERTIES UNION,	)	CASE NO. 4:23-cv-03450-DMR
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
	)	<b>REGARDING BRIEFING SCHEDULE</b>
v.	)	
	)	
UNITED STATES IMMIGRATION AND	)	
CUSTOMS ENFORCEMENT, et al.,	)	
	)	
Defendants.	)	

Plaintiff and Defendants, by and through their undersigned counsel, hereby stipulate and jointly request that the Court set the following briefing schedule for cross-motions for summary judgment:

1. Plaintiff's motion for summary judgment: January 29, 2024
2. Defendants' opposition and cross-motion for summary judgment: February 28, 2024
3. Plaintiff's opposition to Defendants' cross-motion and reply: March 13, 2024
4. Defendants' reply in support of cross-motion: March 26, 2024
5. Hearing on cross-motions for summary judgment: April 25, 2024 at 1:00 p.m.

1 DATED: December 18, 2023

Respectfully submitted,

2 ISMAIL J. RAMSEY  
3 United States Attorney

4 /s/ David M. DeVito  
5 DAVID M. DEVITO  
6 Assistant United States Attorney  
7 *Attorneys for Defendants*

8 AMERICAN CIVIL LIBERTIES UNION  
9 FOUNDATION

10 /s/ Marisol Dominguez-Ruiz  
11 MARISOL DOMINGUEZ-RUIZ  
12 KYLE VIRGIEN  
13 EUNICE CHO  
14 *Attorneys for Plaintiff*

15 **ATTESTATION**

16 In compliance with Civil L.R. 5-1(h)(3), I attest that I have obtained concurrence in the filing of  
17 this document from each of the other signatories.

18 Dated: December 18, 2023

19 By: /s/ David M. DeVito  
20 DAVID M. DEVITO  
21 Assistant United States Attorney  
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**[PROPOSED] ORDER**

Pursuant to the stipulation of the parties, the Court hereby enters the following schedule for the parties' cross-motions for summary judgment:

1. Plaintiff's motion for summary judgment: January 29, 2024
2. Defendants' opposition and cross-motion for summary judgment: February 28, 2024
3. Plaintiff's opposition to Defendants' cross-motion and reply: March 13, 2024
4. Defendants' reply in support of cross-motion: March 26, 2024
5. Hearing on cross-motions for summary judgment: April 25, 2024 at 1:00 p.m.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. DONNA M. RYU  
United States Chief Magistrate Judge